



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

MEMORANDUM

July 28, 2021

Subject: Technical Screen for Cuprous Oxide Product: Seaforce Shield SP Used as an Antifoulant Agent

PC Code(s): 025601	Task Group Case No: 00303971
Registration Number: 2568-RNA	Action Code No.: 00301929
Regulatory Action: Technical Screen	Request Case No.: 00301928
CAS No(s): 1317-39-1	Reg Review Case No.: 4025

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The Agency has conducted a technical screen for the proposed new cuprous oxide product, tradename Seaforce Shield SP (EPA Reg. No. 2568-RNA) by Jotun Paints, Inc. This product is intended to be used as an antifouling agent on vessels greater than 25 meters (82 feet) in length. The product is used to control the attachment of marine fouling, i.e. barnacles, grass, algae, tube worms, mussels, and snails on hulls of boats and vessels in salt, brackish, and freshwater which would sustain such growth. It is suitable on aluminum and carbon steel substrates.

The purpose of this technical screen is to determine whether the label (dated 4/1/21) and other information submitted with the application are sufficient to allow the assessment of human toxicology, occupational and residential exposure (ORE), ecological toxicity, and environmental fate as enumerated in 40 C.F.R. part 158 subpart W.

The application as submitted **fails** the technical screen in that the registrant **did not** provide citations or waiver rationales for the necessary data. The data matrix only contained information on the product chemistry and acute toxicity of the product. The registrant should consult 40 C.F.R. part 158W for information on the toxicology (§158.2230), ecotoxicity (§158.2240 and §158.2250), ORE (§158.2260, §158.2270), and environmental fate (§158.2280) data needed to support their registration. No dietary (residue chemistry §158.2290) data are needed for antifoulant paint uses.

When determining the data requirements for their product, the registrant should submit either data or a data waiver in order to fulfill each data requirement within the following use pattern columns:

- “Nonfood uses—All other nonfood uses” for the human health toxicology data table (§158.2230)
- “Occupational” and “residential” columns for the ORE data tables (§158.2260, §158.2270)
- “Antifoulant coatings and paints” for ecotoxicity data tables (§158.2240 and §158.2250)
- “Antifoulant coatings and paints” for the environmental fate data table (§158.2280)

Additionally, for individual antifouling paint products containing copper in the inorganic form, ISO 10890-2010 calculations should be submitted as required on p. 49 of the September 2018 “Copper Compounds Interim Registration Review Decision” (U.S. EPA, 2018)). Since, the registrant has submitted ASTM D6442-06 data (MRID 51551502), the Agency will accept the submission in addition to the ISO 10890-2010 calculation method, but not in lieu of the ISO method.

Reference:

U.S. EPA. September 2018. Copper Compounds. Interim Registration Review Decision Case Nos. 0636, 0649, 4025, 4026.